

From: [Gelfand, Shira Z.](#)
To: [Gage, Kenneth W.](#); [Tomezsko, Sara B.](#)
Cc: [Cedar, Christine](#); [Greene, Cara](#); [Jumper, Maya](#)
Subject: [EXT] Rowe v. Google [IWOV-OGDMS,FID701188]
Date: Wednesday, November 25, 2020 6:15:58 PM
Attachments: [OGDMS_2000449_1 \(003\).pdf](#)

Ken and Sara,

Please see the attached letter on behalf of Plaintiff Ulku Rowe.

Thanks,
Shira

[Outten & Golden LLP](#)



Shira Z. Gelfand | Associate

685 Third Ave 25th Floor | New York, NY 10017

T 212-245-1000 | F 646-509-2090

sgelfand@outtengolden.com | [Bio](#)



This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

Please consider the environment before printing this e-mail.

Kenneth Gage, Esq.
November 25, 2020
Page 8 of 8

Defendant's November 4 submission.⁴ Therefore, Plaintiff's request is clearly within the time frame outlined under Local Civil Rule 33.3(c) as the parties has substantially completed initial stages of discovery and the discovery cut off has been clearly set forth in the Court's October 1, 2020 Order granting the parties' requested for an extension of the discovery schedule.

Accordingly, Plaintiff reasserts its request for the information sought in Interrogatory Nos. 10-13, 18 and 19.

III. Other Outstanding Discovery

Plaintiff reiterates her request for all documentation, including but not limited to compensation data, resumes, offer letters, gHire feedback, offer packets, gComp data, and performance reviews, related to the hiring, leveling, and compensation setting processes for those individuals considered for and selected for the Financial Services, Vertical Lead – Sales position, for which Plaintiff was qualified and sought consideration.

* * *

Please let us know your availability for a call next week for a meet and confer on the above topics, as instructed by the Court's May 14 Order.

Sincerely,



Cara E. Greene

Enclosures

cc: Maya S. Jumper, Esq.
Shira Z. Gelfand, Esq

⁴ On October 1, Judge Gorenstein approved the parties' modified schedule which clearly set out a final date for the conclusion of fact discovery. *See* ECF No. 60.